THE HONORABLE ROBERT S. LASNIK

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## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JOHN VOLKIRCH, an individual,

Plaintiffs,

v.

SAFEWAY INC., a Delaware Corporation,

Defendant.

**CASE NO. 2:21-cv-01352-RSL** 

STIPULATED MOTION FOR VOLUNTARY DISMISSAL WITH PREJUDICE

**NOTE ON MOTION CALENDAR:** 3/30/2022

Federal Rule of Civil Procedure 41(a)(1)

**CLERK'S ACTION REQUIRED** 

Pursuant to Federal Rule of Civil Procedure 41(a)(1), the parties hereby stipulate that the Court should dismiss the above-referenced action. The parties agree that pursuant to Federal Rule of Civil Procedure 41(a)(1), the dismissal is with prejudice. In addition, the parties stipulate that this dismissal shall be without an award of attorney's fees or costs to either party.

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STIPULATED MOTION FOR VOLUNTARY DISMISSAL – 1

Case No.: 2:21-cv-01352-RSL

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## RESPECTFULLY SUBMITTED this 30th day of March, 2022. 1 VANGUARD LAW, PLLC LANE POWELL PC 2 3 By /s/ Spencer Nathan Thal By /s/D. Michael Reilly Spencer Nathan Thal, WSBA #20074 D. Michael Reilly, WSBA No. 14674 4 1420 Fifth Avenue, Suite 4200 Vanguard Law, PLLC PO Box 939 P.O. Box 91302 5 Poulsbo WA 98370 Seattle, Washington 98111-9402 Email: reillym@lanepowell.com 6 Phone: (206) 488-8344 Email: spencer@vanguardlawfirm.com 7 Attorney for Plaintiff Attorney for Defendant 8 9 By /s/ Zachariah Thal By /s/Priya B. Vivian 10 Spencer Nathan Thal, WSBA #55462 Priya B. Vivian, WSBA No. 51802 Vanguard Law, PLLC 1420 Fifth Avenue, Suite 4200 11 PO Box 939 P.O. Box 91302 Seattle, Washington 98111-9402 Poulsbo WA 98370 12 Email: vivianp@lanepowell.com Phone: (206) 818-2499 Email: zach@vanguardlawfirm.com 13 14 Attorney for Plaintiff Attorney for Defendant 15 16 17 18 19 20 21 22 23 24 25

 $\textbf{STIPULATED} \ \text{MOTION FOR VOLUNTARY DISMISSAL} - 2$ 

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